

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

**14-CR-177-RJA-JJM**

v.

**NOTICE OF MOTION**

DIJON HARRIS,

Defendant.

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**MOTION BY:**

John Humann, Senior Litigator, Attorney for  
Defendant, Dijon Harris.

**DATE, TIME & PLACE:**

Before the Honorable Jeremiah J. McCarthy,  
United States Magistrate Judge, United States  
Courthouse, 2 Niagara Square, Buffalo, New York,  
**on the papers.**

**SUPPORTING PAPERS:**

Affirmation of Senior Litigator John Humann, dated  
June 12, 2015.

**RELIEF REQUESTED:**

Further discovery.

**DATED:**

Buffalo, New York, June 12, 2015.

**/s/ John Humann**

John Humann  
Senior Litigator  
Federal Public Defender's Office  
300 Pearl Street, Suite 200  
Buffalo, New York 14202  
(716) 551-3341; FAX: (716) 551-3346  
[john\\_humann@fd.org](mailto:john_humann@fd.org)

**TO:** Wei Xiang  
Assistant United States Attorney

UNITED STATES DISTRICT COURT  
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**AFFIRMATION**

**JOHN HUMANN**, affirms under penalty of perjury that:

1. I represent Dijon Harris.
2. The government provided a redacted copy of the informant's testimony to Judge Drury. We understand the government's desire to keep secret the informant's identity. However, we feel the following should be turned over to the defense.
3. The informant identifies the defendant by his street name. We should be informed of that, so we know whether the informant is accurate. I'm sure the informant is one of 100 people that knows the defendant by his street name.
4. We should be informed as to how much heroin the informant bought and what was the dollar amount.

5. On page 5, there is a question of where the informant learned that the defendant sells heroin and the answers are blocked out. I think we are entitled to that.

6. There are several lines blocked out on pages 6 and 7. Unless that goes to the informant's identity, we think that should be turned over.

7. On page 18, the informant identifies who lives at 335 Hewitt. We should be entitled to that and his other information about who lives there.

**DATED:** Buffalo, New York, June 12, 2015.

Respectfully submitted,

/s/ John Humann

John Humann  
Assistant Federal Public Defender  
Federal Public Defender's Office  
300 Pearl Street, Suite 200  
Buffalo, New York 14202  
(716) 551-3341; FAX: (716) 551-3346  
[john\\_humann@fd.org](mailto:john_humann@fd.org)  
Attorney for Defendant: Dijon Harris

TO: Wei Xiang  
Assistant United States Attorney